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8 **UNITED STATES DISTRICT COURT**  
9 **EASTERN DISTRICT OF CALIFORNIA**  
10

11 UNITED STATES OF AMERICA,  
12 Plaintiff,

13  
14 v.  
15

16 TANNER JOEL HERNANDEZ-FIELDS,  
17 Defendant.  
18  
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Case No: 1:20-CR-00221-DAD-BAM

**STIPULATION BETWEEN THE UNITED  
STATES AND DEFENDANT REGARDING  
PRODUCTION OF PROTECTED  
INFORMATION; PROTECTIVE ORDER**

20 WHEREAS, the discovery in this case contains private personal information regarding third  
21 parties, including but not limited to their names, dates of birth, physical descriptions, telephone numbers  
22 and/or residential addresses ("Protected Information"); and

23 WHEREAS, the parties desire to avoid both the necessity of large scale redactions and the  
24 unauthorized disclosure or dissemination of this information to anyone not a party to the court  
25 proceedings in this matter;

26 The parties agree that entry of a stipulated protective order is therefore appropriate.  
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1           THEREFORE, defendant TANNER JOEAL HERNANDEZ-FIELDS, by and through his  
2 counsel of record (“Defense Counsel”), and the United States of America, by and through its counsel of  
3 record, hereby agree and stipulate as follows:

4           1.       This Court may enter a protective order pursuant to Rule 16(d) of the Federal Rules of  
5 Criminal Procedure, and its general supervisory authority.

6           2.       This Order pertains to all discovery provided to or made available to Defense Counsel as  
7 part of discovery in this case (hereafter, collectively known as “the discovery”).

8           3.       By signing this Stipulation and Protective Order, Defense Counsel agrees not to share any  
9 documents or other information that contain Protected Information with anyone other than Defense  
10 Counsel’s attorneys, designated defense investigators, designated defense experts, and support staff.  
11 Defense Counsel may permit the defendant to view unredacted documents or other information in the  
12 presence of his attorneys, defense investigators, and/or support staff. The parties agree that Defense  
13 Counsel, defense investigators, and support staff shall not allow the defendant to copy Protected  
14 Information contained in the discovery. The parties agree that Defense Counsel, defense investigators,  
15 and support staff may provide the defendant with copies of documents or other information, if any, from  
16 which Protected Information has first been redacted.

17           4.       The discovery and information therein may be used only in connection with the litigation  
18 of this case and for no other purpose. The discovery is now and will forever remain the property of the  
19 United States of America (“Government”). Defense Counsel will return the discovery to the Government  
20 or alternatively keep it archived within its sole possession at the conclusion of the case.

21           5.       Defense Counsel will store the discovery in a secure place and will use reasonable care to  
22 ensure that it is not disclosed to third persons in violation of this agreement.

23           6.       Defense Counsel shall be responsible for advising the Defendant, employees, and other  
24 members of the defense team, and defense witnesses of the contents of this Stipulation and Order.

25           7.       In the event that Defendant substitutes counsel, undersigned Defense Counsel agrees to  
26 return the discovery to the government, or, at the request of government counsel, to forward it to new  
27 counsel after new counsel has confirmed to government counsel in writing his or her agreement to the  
28

1 terms of this Order.

2 IT IS SO STIPULATED.

3  
4 Dated: December 22, 2020

By: /s/ Douglas Foster  
Douglas Foster  
Attorney for Defendant  
Tanner Joel Hernandez-Fields

5  
6 Dated: December 22, 2020

McGREGOR W. SCOTT  
United States Attorney

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9 By: /s/ Laura D. Withers  
Laura D. Withers  
Assistant U.S. Attorney

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11 IT IS SO ORDERED.

12  
13 Dated: December 22, 2020

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE